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Attorneys for Defendants City of Laguna Beach, Laguna Beach Police Department,
Sgt. George Ramos and Sgt. Jason Farris

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

CHRISTIE PARK, KEVIN CLAYTON
PARK, AMANDA PARK, a minor by and
through her guardian Ad Litem JUNE
SLACK, ESTATE OF KEVIN PARK and
ESTATE OF JONI PARK,

Plaintiffs,

vs.

CITY OF LAGUNA BEACH, LAGUNA
BEACH POLICE DEPARTMENT, SGT.
GEORGE RAMOS AND SGT. JASON
FARRIS, COUNTY OF ORANGE and
DOES 1 to 100,

Defendants.

No. SACV 08-00612 DOC
(RNBx)

**PROTECTIVE ORDER
REGARDING DISCLOSURE
INFORMATION FROM LAW
ENFORCEMENT RECORDS**

Protective Order:

1 **Protective Order:**
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3 1. Counsel for Defendants, City of Laguna Beach, Laguna Beach Police
4 Department, Sgt. George Ramos and Sgt. Jason Farris, shall disclose to
5 counsel for plaintiffs, records containing personnel matters, including but not
6 limited to records of this incident obtained from the Confidential Investigative
7 Report of the Orange County District Attorney's Office. Such disclosure shall take
8 place on or before October 13, 2008. Documents being withheld due to any
9 attorney client privilege, a detailed privilege log that conforms to Code will be
10 produced at the time of the document disclosure.

11 2. Counsel for the plaintiffs shall not convey, transfer, publish,
12 distribute, copy, duplicate or disseminate the information so provided except as
13 may be reasonably necessary for the prosecution of this litigation, by
14 communicating with plaintiffs, or investigators, consultants and experts retained on
15 behalf of the plaintiffs in this matter.

16 3. Prior to the dissemination of any such information pursuant to this
17 order, counsel for the plaintiffs shall inform any such person or persons of the
18 terms and conditions of this order and secure such person's agreement to be bound
19 by it.

20 4. In Order to maintain such confidentiality, said documents or portions
21 of said documents may be used or referenced within a motion, opposition to a
22 motion, reply to an opposition, as exhibits thereof, or referenced within an expert
23 declaration or deposition in support of a motion, opposition or reply, upon filing
24 such documents or referencing parts under separate cover and marked
25 "Confidential Material" filed pursuant to Stipulation and Order.

26 5. Plaintiffs, plaintiffs' counsel, and plaintiff's investigators, consultants
27 and experts, are expressly prohibited from utilizing the disclosed information for
28 any purpose other than the prosecution of *Park v. City of Laguna Beach*, Case No.

1 SACV 08-00612 DOC (RNBx) and the information disclosed shall not be utilized
2 in any other proceeding or litigation, or for any other purpose.

3 6. Plaintiffs, plaintiffs' counsel, and plaintiff's investigators, consultants
4 and experts, are expressly prohibited from disclosing orally or otherwise the
5 information subject to this Protective Order to any person other than those who are
6 reasonably necessary for the prosecution of *Park v. City of Laguna Beach*, Case
7 No. SACV 08-00612 DOC (RNBx) .

8 7. Plaintiffs, plaintiffs' counsel, and plaintiff's investigators, consultants
9 and experts, are expressly prohibited from duplicating, copying or otherwise
10 distributing or disseminating any of the disclosed information to any person or
11 entity.

12 8. Counsel for Plaintiffs shall take reasonable precaution to prevent the
13 unauthorized or inadvertent disclosure of any of the protected information.

14 9. At the final conclusion of this action, all disclosed materials including
15 any and all copies shall be returned to the counsel for the Defendants without
16 request and within 30 days of the final judgment or dismissal, including any
17 appeals, if any.

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19 **IT IS SO ORDERED:**

20 Date: September 29, 2008


21 Honorable David O. Carter
22 United States District Judge
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I, Coleen, employed in the aforesaid County, State of California; I am over the age of 18 years and not a party to the within action. My business address is 1631 East 18th Street, Santa Ana, California 92705-7101.

On September 29, 2008, I served the **[PROPOSED] PROTECTIVE ORDER REGARDING DISCLOSURE INFORMATION FROM LAW ENFORCEMENT RECORDS** on the interested parties in this action by placing a true copy thereof, enclosed in a sealed envelope, addressed as follows:

Harley Bjelland, Esq.
23120 Alicia Parkway, Suite 221
Mission Viejo, CA 92692

____ (By Mail) I placed such envelope for deposit in accordance with office practice, sealed, with postage thereon fully paid and the correspondence to be deposited in the United States mail at Santa Ana, California on the same day.

XXX (By e-filing) The above noted individuals are registered with the Court to receive notice of electronically filed documents. Per ECF rules, hard copies must be served only on parties who are not set up for electronic notification.

____ (By Personal Service) I caused such envelope to be delivered by hand to the office of the addressee.

____ (State) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

XXX (Federal) I declare under penalty of perjury that the foregoing is true and correct, and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed September 29, 2008, at Santa Ana, California.

/s/ Coleen M. Ludvigson
Coleen M. Ludvigson